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Attorneys for Federal Defendants

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

CANA FOUNDATION, a non-profit
 corporation, LAURA LEIGH, individually, and
 WILD HORSE EDUCATION, a nonprofit
 corporation,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF THE
 INTERIOR, BUREAU OF LAND
 MANAGEMENT, and JON RABY, Nevada
 State Director of the Bureau of Land
 Management,

Federal Defendants.

Case No. 2:22-cv-01200-CDS-BNW

**CONSENT MOTION TO EXTEND
 BRIEFING DEADLINES FOR
 SUMMARY JUDGMENT AND
 JUDICIAL NOTICE MOTION**

Federal Defendants, the Bureau of Land Management and Jon Raby, in his official capacity as the State Director for the Bureau of Land Management in Nevada, respectfully request that the Court extend the remaining briefing deadlines pertaining to the parties' cross-motions for summary judgment and to Plaintiffs' Motion for Judicial Notice.

Per the Court's order entered on September 27, 2023, ECF Doc. 49, the following deadlines currently apply to the parties' remaining summary judgment briefs:

- 1 • **February 23, 2024:** Federal Defendants shall file their Opposition to Plaintiffs’
2 Motion for Summary Judgment and Cross-Motion for Summary Judgment (limited
3 to 50 pages).
- 4 • **March 22, 2024:** Plaintiffs shall file their Reply in Support of their Motion for
5 Summary Judgment and Opposition to Federal Defendants’ Cross-Motion for
6 Summary Judgment (limited to 40 pages).
- 7 • **April 19, 2024:** Federal Defendants shall file their Reply in Support of their Motion
8 for Summary Judgment (limited to 30 pages).

9 Per the Court’s order entered on December 19, 2023, ECF Doc. 53, which aligned the
10 briefing deadlines for Plaintiffs’ motion for judicial notice (ECF No. 51) with the summary
11 judgment deadlines set forth above, the following briefing deadlines currently apply to
12 Plaintiffs’ motion for judicial notice:

- 13 • **February 23, 2024:** Federal Defendants shall file their Opposition to Plaintiffs’
14 Motion for Judicial Notice.
- 15 • **March 22, 2024:** Plaintiffs shall file their Reply in Support of their Motion for
16 Judicial Notice.

17 Counsel for Federal Defendants have conferred with counsel for Plaintiffs regarding a
18 request to extend, due to personal reasons, the above deadlines by 14 days. Plaintiffs consented
19 to the requested extension, subject to the modification of one of the remaining deadlines to
20 account for a conflict.

21 The amended deadlines that the parties have consented to are as follows:

- 22 • **March 8, 2024:** Federal Defendants shall file their Opposition to Plaintiffs’ Motion
23 for Summary Judgment and Cross-Motion for Summary Judgment (limited to 50
24 pages) and their Opposition to Plaintiffs’ Motion for Judicial Notice.
- 25 • **April 12, 2024:** Plaintiffs shall file their Reply in Support of their Motion for
26 Summary Judgment and Opposition to Federal Defendants’ Cross-Motion for
27 Summary Judgment (limited to 40 pages) and their Reply in Support of their Motion
28 for Judicial Notice.
- **May 10, 2024:** Federal Defendants shall file their Reply in Support of their Motion
for Summary Judgment.

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2 Accordingly, Federal Defendants respectfully request that the Court enter the amended
3 briefing deadlines set forth above and in the accompanying proposed order.
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6 Dated: February 15, 2024

7 Respectfully Submitted,

8 TODD KIM, Assistant Attorney General
9 United States Department of Justice
Environment and Natural Resources Division

10 /s/ Michelle M. Spatz
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 15, 2023, I filed the foregoing Consent Motion to Extend Briefing Deadlines for Summary Judgment and Judicial Notice Motion electronically through the CM/ECF system, which caused all parties or counsel of record to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Michelle M. Spatz
Michelle M. Spatz
U.S. Department of Justice